

As a RID certified Interpreter I petition the FCC to at least extend the waiver for speed of answer. Furthermore, I believe it would be prudent for the FCC to better research the availability of interpreters before imposing any such regulation at all. Imposing and such regulation would force VRS agencies to hire underqualified interpreters. Calls would perhaps be answered in the prescribed time but a whole new set of delays would be awaiting the callers. Professional and qualified interpreters must adhere to the Registry of Interpreter's Code of Ethics. Tennent 4 of that code states, "Interpreters/translitterators shall accept assignments using discretion with regard to skill, setting, and the consumers involved." In other words it is unethical for an interpreter to interpret material beyond their skill level. Because the nature of a call is unpredictable both at the onset and during the call, determining the qualification of the interpreter would be impossible. A recent example is when teaming interpreters were patched directly into a court hearing without warning. A hearing was already under way and it would have been very inconvenient for the court to be informed that the interpreter were not qualified.

On the flip-side the deaf community relies heavily on the accuracy provided by certified interpreters. Forcing VRS agencies into a position where they must employ non-certified interpreters would cause them to lose much of the confidence the deaf community places in them. If the FCC were to poll this community I think they would find the deaf would prefer the long hold time to a non-certified interpreter. Imagine the 911 caller reaching an interpreter who duly apologizes for the inconvenience but must admit to being underqualified to handle the call. If I were calling 911 with a true medical emergency, I surely would not wish to have someone learning English handle the call. I would want a skilled, competent English speaker to be on the receiving end. I believe it is prudent for the FCC to preserve the level of competency and quality the VRS has been able to provide.

Thank you.